UNITED	STATES	DISTR	ICT (	COU	RT
SOUTHE	RN DIST	RICT	OF NE	W	YORK

VS.

NAC HOLDDIGG GDOLD DIG ' C

CMG HOLDINGS GROUP, INC. as assignee of XA, THE EXPERIENTIAL AGENCY, INC.,

Civil Action No.: 15-cv-05814-JPO

Plaintiff.

: <u>NO</u>1

NOTICE OF CHARGING LIEN

JOSEPH WAGNER, HUDSON GRAY LLC, DARREN ANDERECK, JESSIE LOMMA, MICHAEL DAY, JEAN WILSON, ESTELLE PIZZO, STUDIO AG, LLC, REMIGIO GUDIN, and MIXED COMPANY, INC.,

Defendants.

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PLEASE TAKE NOTICE that pursuant to Section 475 and 475-a of the Judiciary Law, Edwards Pottinger, LLC, former attorneys of record for Plaintiff CMG Holdings Group, Inc. and Third-Party Defendants Glenn Laken and Alexis Laken, have a charging lien upon the proceeds of this action, including any settlement proceeds, in the amount of \$31,755.16 dollars in costs and expenses. Edwards Pottinger, LLC does not assert a charging lien for attorney fees.

This lien shall not be affected by any settlement between the parties before or after judgment, final order or determination.

PLEASE TAKE FURTHER NOTICE that pursuant to applicable law, anyone who disregards said lien may be held to be personally liable to Edwards Pottinger, LLC. Judiciary Law Sec. 475; *LMWT Realty Corp. v. Davis Agency, Inc.*, 85 N.Y.2d 462, 649 N.E.2d 1183, 626 N.Y.S.2d 39 (Ct. of Appeals 1995).

A supporting declaration is attached hereto pursuant to Local Rule 1.4.

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Dated: July 19, 2019

Bradley J. Edwards (brad@epllc.com)
Seth M. Lehrman (seth@epllc.com)
EDWARDS POTTINGER, LLC
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Tel. (954) 524-2820
Fax: (954) 524-2822

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK		
	X	
CMG HOLDINGS GROUP, INC. as assignee of	:	
XA, THE EXPERIENTIAL AGENCY, INC.,	:	Civil Action No.: 15-cv-05814-JPO
	:	
Plaintiff,	:	
	:	
vs.	:	DECLARATION
	:	
JOSEPH WAGNER, HUDSON GRAY LLC,	:	
DARREN ANDERECK, JESSIE LOMMA,		
MICHAEL DAY, JEAN WILSON, ESTELLE		
PIZZO, STUDIO AG, LLC, REMIGIO GUDIN,	:	
and MIXED COMPANY, INC.,	:	
	;	
Defendants.	:	
	- X	
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## SETH LEHRMAN declares as follows:

Dated: July 19, 2019

- 1. I respectfully submit this declaration, pursuant to Local Rule 1.4 of the United States

  District Court for the Southern District of New York, in support of the Notice of Charging Lien.
- 2. Bradley J. Edwards and I were former attorneys of record in the instant action for Plaintiff CMG Holdings Group, Inc., and Third-Party Defendants Glenn Laken and Alexis Laken.
- 3. Our law firm, Edwards Pottinger, LLC, has a charging lien upon the proceeds of this action, including any settlement proceeds, in the amount of \$31,755.16 dollars in costs and expenses.

4. Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the forgoing is true and correct.

Seth Lehrman

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 19, 2019, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this date via U.S. mail and/or some other authorized manner for those counsel or parties, if any, who are not authorized to receive electronically Notices of Electronic Filing.

Seth Lehrman